

From: Ragsdale, Dave (ECY)
Sent: Thursday, February 14, 2008 10:38 AM
To: Snouwaert, Elaine (ECY)
Cc: Joy, Joe (ECY)
Subject: RE: Hangman Creek TMDL

Thanks Elaine. I received the file you sent previously and am current reading it. I just started going through the draft report and will insert notes, comments, questions as mark-up and send it to you. Perhaps I won't have much or anything to say.

Not to alarm you (because I really am just starting to read the Hangman report) but one question I'm pondering and I want to talk with Cusimano and Joe about is clarifying whether loading capacity for P in the Spokane (and thereby for the mouth of Hangman) was determined in lbs or as a concentration. As you know, the Spokane analyses determined there is no P loading capacity for the point sources (WLA = zero). To avoid saying 'no discharge' to the Spokane permittees, Ken and I developed the approach under which discharges at the estimated natural conditions (concentration) were assumed to not cause or contribute to violation of water quality standards. Under this presumption, discharge(s) of any volume at the natural condition concentration should not contribute to increasing the in-stream nutrient concentrations. However, applying that concentration as a fixed number of pounds of loading is not always protective of water quality because of variation in the volume of discharge flow. Similarly, the loading for Hangman during the April-May period of more normal spring runoff years is significantly greater than the loading observed during critical low-flow years (like 2001-2003). I understand we cannot mix/match critical conditions of low flow from dry, warm years with high spring runoff from wetter or snowy years... but am wondering about the validity and protectiveness of expressing load allocations as a concentration.

Like I said, I'm just getting started with my and intend to send you whatever comments, question or recommendation I develop by next Wednesday. Thanks again for providing a little more time to complete my work. Dave.

From: Snouwaert, Elaine (ECY)
Sent: Thursday, February 14, 2008 9:50 AM
To: Ragsdale, Dave (ECY)
Subject: RE: Hangman Creek TMDL

Hi Dave,
 I followed up my email response yesterday by sending the file. Did it come through? Its 6MB so that could be causing problems. Here's a PDF of it that's a little smaller just in case.
 Elaine

From: Ragsdale, Dave (ECY)
Sent: Wednesday, February 13, 2008 1:33 PM
To: Snouwaert, Elaine (ECY)
Subject: RE: Hangman Creek TMDL

Elaine. I cannot open the SharePoint file. Perhaps I do not have "permission". Could you just send me the file?
 Thanks. Dave

From: Snouwaert, Elaine (ECY)
Sent: Wednesday, February 13, 2008 10:04 AM
To: Ragsdale, Dave (ECY)
Cc: Joy, Joe (ECY); 'Rick Noll'; 'Mann.Laurie@epamail.epa.gov'; 'Mann.Laurie@epamail.epa.gov'; McGuire, Patrick D. (ECY); Koch, Richard A. (ECY); Peterschmidt, Lucy (ECY); Wall, Cynthia (ECY); Nichols, Donald G. (ECY)
Subject: RE: Hangman Creek TMDL

Hi Dave,
 Well unfortunately a few of the permittees may have already received it. I know at least one permit manager already sent out the ftp site. I have deleted the files from the ftp site so if they haven't accessed it yet they should not be able to get to it. If one was able to get a copy of it before I deleted them it will probably circulate quickly. Most of the advisory group has seen earlier drafts but much of the technical portions were not completed.

We have our advisory committee scheduled for Feb. 21st so we wanted to provide them a copy in advance of this meeting so we would be able to discuss it with an aware audience. I suppose we could consider waiting until March to meet with them. Also we have scheduled a meeting with the permittees for March 3rd to discuss it with them. They also wanted 2 plus weeks to review it before this meeting. We could probably reschedule this too.

Permit Managers - please communicate to your permittees about this delay and let them know we'll be in touch. Also please let them know we are aware the FTP site link does not work.

Sorry for the confusion everyone!
Elaine

From: Ragsdale, Dave (ECY)
Sent: Wednesday, February 13, 2008 9:20 AM
To: Snouwaert, Elaine (ECY)
Cc: Joy, Joe (ECY); 'Rick Noll'; 'Mann.Laurie@epamail.epa.gov'; 'Mann.Laurie@epamail.epa.gov'
Subject: RE: Hangman Creek TMDL

Elaine. Although you clarified that "substantive changes are still very possible" for this TMDL, I would like EPA to have an opportunity to review and comment on the draft TMDL before it goes to the public (advisory committee and permittees). After taking over three years to develop this TMDL there is no reason to rush a draft document out the door without verifying that Ecology and EPA are in agreement with the modeling approach, LAs, WLAs, ect. The mutual goal of our agencies under the TMDL Redesign is to flag and resolve potential problems as the TMDL is developed. I just need a little time to make sure there are no fatal flaws, as you call them. Talking briefly with Joe raises one topic which may be a concern is setting WLAs for nutrients that are protective of far field effects (at the Creek mouth) but are protective of near field dissolved oxygen.

Looking at my schedule, I believe I could review and provide comment to you by COB next Wednesday (Feb 20). I am booked the rest of this morning but should be around this afternoon if you want to talk. Thanks for your understanding.

Dave

From: Snouwaert, Elaine (ECY)
Sent: Tuesday, February 12, 2008 4:08 PM
To: Ragsdale, Dave (ECY)
Cc: Joy, Joe (ECY); 'Rick Noll'
Subject: Hangman Creek TMDL

Dave,
We have a preliminary draft of the Hangman Creek TMDL. We will be sending this our advisory committee and the permittees this week and will be meeting with the advisory committee next week and the permittees March 3rd to go over it. It is also under-going our technical and policy reviews internally. I would like to ask you to conduct your "informal" review for any fatal flaws. We anticipate having this ready for the public comment period near the end of April. You can access the draft report at: <http://www.ecy.wa.gov/Hangman%20Creek%20TMDL/>. Keep in mind that substantive changes are still very possible.

Please let us know if you have any questions or concerns.
Elaine

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